

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF IOWA

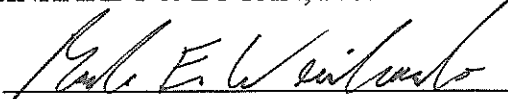
UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	Case No. 4:13-CR-147
)	
v.)	
)	MOTION FOR LEAVE TO FILE
LI SHAOMING, MO HAILONG, also)	UNDER SEAL
known as Robert Mo, WANG LEI,)	
WANG HONGWEI, YE JIAN, and LIN)	
YONG,)	
)	
Defendants.)	

The Defendant, Mo Hailong requests this Court leave to file his motion to amend conditions of release under seal. In support of his motion, Mr. Hailong states as follows:

1. The undersigned counsel propose to file a motion to amend Mr. Hailong's conditions of release.
2. Due to extensive media interest in this case, including attempts to film the Defendant, the parties wish to keep the details of his conditions of his release confidential.
3. The government is in agreement with this motion being filed under seal.

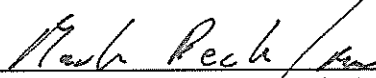
WHEREFORE, the Defendant, Mo Hailong, prays this Court for an order granting his motion for leave to file a motion under seal.

WEINHARDT & LOGAN, P.C.

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ATTORNEYS FOR MO HAILONG, ALSO
KNOWN AS ROBERT MO

PROOF OF SERVICE

The undersigned certifies that the foregoing instrument was served upon the parties to this action by serving a copy upon each of the attorneys listed below on Jan 15, 2015, by

- | | |
|---|--|
| <input type="checkbox"/> U.S. Mail | <input type="checkbox"/> FAX |
| <input type="checkbox"/> Hand Delivered | <input type="checkbox"/> Electronic Mail |
| <input type="checkbox"/> FedEx/ Overnight Carrier | <input checked="" type="checkbox"/> CM / ECF |

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